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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 AMMANDA SOLIZ,

Case No.: 3:21-cv-00459-RCJ-WGC

12 Plaintiff,

13 vs.
14 ELITE SPICES, INC.,

15 Defendant.

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER
SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)**

17 Pursuant to Fed. R. Civ. P. 26 and LR 26-1, Plaintiff AMMANDA SOLIZ, and Defendant
18 ELITE SPICES, INC., by and through their attorneys of record, herewith submit their Stipulated
19 Discovery Plan and Scheduling Order. The parties are requesting a 180-day discovery plan.

20 1. **Initial Disclosures:** Pursuant to Fed. R. Civ. P. 26(f)(1), the parties, by and
21 through their respective counsel, conferred telephonically on January 3, 2022. Pursuant to Fed.
22 R. Civ. P. 26(a)(1), the parties will exchange initial disclosures on or before January 17, 2022.

23 3. **Discovery Plan:** The parties agree that the subjects of discovery should include,
24 but not be limited to, all claims and defenses allowed pursuant to the Federal Rules of Civil
25 Procedure. The parties have identified (1) no needed changes to the timing, form or requirement
26 for disclosures; (2) no issues about (a) disclosure, discovery, or preservation of electronically
27 stored information or (b) claims of privilege or of protection; and (3) no needed changes in the

1 limitations on discovery imposed under the federal rules of civil procedure or the local rules and
2 no need to conduct discovery in phases. Although the parties are working together on a proposed
3 protective order, the parties do not propose that the Court should issue any orders under Rule 26(c)
4 or Rule 16(b) or (c) at this time.

5 **3. Discovery Cut-Off Date(s):** Plaintiff filed their Complaint and Jury Demand on
6 October 26, 2021. Defendant filed its Answer to the Complaint and Jury Demand on November
7 19, 2021. The last day of discovery shall therefore be **May 18, 2022**, 180 days from when the
8 defendant answered.

9 **4. Amending the Pleadings and Adding Parties:** The parties shall have until
10 **February 17, 2022**, ninety (90) days before the discovery cut-off date, to file any motions to
11 amend the pleadings or to add parties.

12 **5. Expert Disclosures:** Initial expert disclosures related to the claims for relief in the
13 original Complaint and third-party discovery are due **March 18, 2022**, approximately sixty (60)
14 before the discovery cut-off date (exactly sixty days lands on a Saturday). Rebuttal expert
15 disclosures are due on **April 18, 2022** (exactly thirty days lands on a Sunday). Expert deposition
16 must be completed within thirty days of the last expert disclosure.

17 **6. Dispositive Motions:** The parties shall have until **June 17, 2022**, thirty (30) days
18 after the discovery cut-off to file dispositive motion(s).

19 **7. Pretrial Order:** The pretrial order shall be filed on **July 17, 2022**, approximately
20 thirty (30) days after the date set for filing dispositive motions in the case (exactly thirty days lands
21 on a Sunday). In the event a dispositive motion is filed, the date for the filing pretrial order shall
22 be suspended until thirty (30) days after the decision of the dispositive motions or further order of
23 the Court.

24 **8. Fed. R. Civ. P. 26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ. P.
25 26(a)(3), and any objections thereto, shall be included in the pretrial order.

26 **9. Alternative Dispute Resolution:** In compliance with LR 26-1(b)(7), the parties
27 certify that they met and conferred about the possibility of using alternative dispute resolution

1 processes, but no agreement has been reached. Nonetheless, the parties intend to participate in the
2 early neutral evaluation currently scheduled for February 10, 2022 in good faith. The parties will
3 continue to evaluate opportunities for alternative dispute resolution.

4 **10. Alternative Forms of Case Disposition:** The parties certify that they considered
5 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use
6 of the Short Trial Program (General Order 2013-01). The parties are not amenable to have the
7 United States Magistrate Judge preside over all aspects of this case, and the parties believe this
8 case should proceed on the normal litigation track.

9 **11. Electronic Evidence:** The parties certify that they have discussed but have not
10 made any plans or reached any stipulations about providing discovery or presenting evidence to
11 jurors in electronic format.

12 Respectfully submitted this 3rd day of January, 2022.

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14 MARK MAUSERT LAW OFFICE

JACKSON LEWIS P.C.

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22 IT IS SO ORDERED:

23
24 William G. Cobb
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: January 4, 2022